Mark A. Serlin, CSBN: 122155 1 SERLIN & WHITEFORD, LLP 2 700 E Street Sacramento, CA 95814 3 Telephone: (916) 446-0790 (916) 446-0791 Facsimile: 4 Email: ms@swllplaw.com 5 **Attorneys for Creditor AG-SEEDS UNLIMITED** 6 7 UNITED STATES BANKRUPTCY COURT 8 EASTERN DISTRICT OF CALIFORNIA 9 (SACRAMENTO DIVISION) 10 In re: CASE NO. 15-29136 11 Chapter 12 **LAND** P&M **SAMRA** 12 INVESTMENTS, LLC, DCN: NCK-014 1.3 **DECLARATION OF MARK A. SERLIN IN** 14 Debtor. SUPPORT OF OBJECTION TO MOTION TO MODIFY CONFIRMED 12 PLAN 15 16 Date: February 20, 2018 Time: 10:00 a.m. 17 Ctrm: A Judge: McManus 18 19 20

## I, Mark A. Serlin, declare:

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- I am an attorney duly licensed to practice law by the State of California and am authorized to practice before this Court. I am counsel of record to creditor Ag-Seeds Unlimited. I make this declaration based on personal knowledge, and if called as a witness to testify as to matters stated herein, I would be willing and competent to do so.
- 2. As described to the Court and parties in open court on February 5, 2018, I will be out of the country and totally unavailable from February 19, 2018 through March 4, 2018. I specifically advised the Court that I will not be available for the continued hearing on February 20, 2018.

1	3. My partner, Kevin Whiteford, is unable to attend the hearing on February 20, 2018
2	because he has to be in Santa Cruz County for a debtor's examination in an unrelated matter. That
3	debtor's examination was scheduled well before the February 5, 2018 hearing in this case. As
4	such, Mr. Whiteford simply cannot attend the hearing.
5	4. I am concurrently filing an objection to the debtor's motion to modify its confirmed
6	Chapter 12 plan. I request that the Court set a briefing schedule which takes into account my
7	absence from the country as described above.
8	I declare under penalty of perjury that the foregoing is true and correct and that this
9	declaration was executed at Sacramento, California, on February 12, 2018.
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11	/s/ Mark A. Serlin
12	MARK A. SERLIN
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	DECLARATION OF SERLIN RE OBJECTION 2 In re: P&M Samra Land Investments, LLC